

<b>United States District Court</b>					
<b>SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION</b>					
<b>CRUZ VALDIVIESO FIGUERA,</b>  Plaintiffs,  vs.  <b>ALL VIP CARE INC. AND</b> <b>LIZ VELAZQUEZ MCKINNON,</b>  Defendants.			<b>PLAINTIFF'S TRIAL EXHIBIT LIST</b> <b>With Defendants' AMENDED OBJECTIONS</b>  CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT		
PRESIDING JUDGE  <b>HONORABLE</b> <b>WILLIAM P.</b> <b>DIMITROULEAS</b>		PLAINTIFF'S ATTORNEY  <b>FAIRLAW FIRM</b> Brian H. Pollock, Esq. 135 San Lorenzo Ave Suite 770 Coral Gables, FL 33146		DEFENDANT'S ATTORNEY  <b>FLORIDA HEALTHCARE LAW FIRM.</b> Randy M. Goldberg Esq., 151 NW 1 <sup>st</sup> Avenue., Delray Beach, FL 33444	
TRIAL DATE(S)  <b>October 23, 2023</b>		COURT REPORTER		COURTROOM DEPUTY	
PLTF. NO	DATE OFFERED	MARKE D	OBJECTIONS	ADMITTED	Exhibit
1			A, I, H, R UP		Cesar Izique Sr. Letter Statement
2					Defendants' Response to Plaintiff's Request for Production
3			A, I, H, R UP		Acknowledgement of Nurse Registry Policy & Procedure
4			A, I, H, R UP		Affidavit of Compliance with Background Screening
5					Defendant, All VIP's Answers to Plaintiff's Interrogatories
6			A, I, H, R UP		All VIP Website Homepage
7			A, I, H, R UP		Ana Maria Rowland Contact Information
8			A, I, H, R UP		Angela Melendez Contact Information
9			A, I, H, UP		Application for Contract or Employment
10			A, I, H, R UP		Check #517, #2414
11			A, I, H, R UP		Unpaid Wages email to Leslie Rodriguez
12			A, I, H, R UP		Email from Ana Maria Rowland
13			A, I, H, UP		Home Health Aide/Certified Nursing Assistant Job Description
14			A, I, H, R UP		Humana Letter Response
15			A, I, H, UP		Independent Contractor Professional Liability Policy
16			A, I, H, UP		Independent Contractor Agreement
17			A, I, H, UP		All VIP Care Letter regarding Application
18			A, I, H, UP		Luz D. Soto Contact Information
19			A, I, H, R UP		Humana Records

20			A, I, H, UP		HHA Exchange Patient Calendar
21			A, I, H, R UP		Google Review to All VIP Care Inc.
22			A, I, H, UP *1		All VIP Care & Staffing Weekly Visit Record 6/13/22
23			A, I, H, R UP		Text Messages from Evelyn Vapi
24			A, I, H, UP		Text Messages between Daisy Valdivieso and Diane
25			A, I, H, R UP		All VIP Care & Staffing Weekly Visit Record 5/30/22
26					Defendant, Velazquez McKinnon's Answers to Plaintiff's Interrogatories
27			A, I, H, UP		Waiver of Professional Liability Insurance
28			R, I, UP *2		Plaintiff's Paystubs

\*1: This exhibit is a compilation of 53 pages, designated as VIP.DOCS.11-63. Defendant does not object to Pages No. 12, 14, 16, 18, 20, 23, 27, 28, 29, 32, 33, 34, 36, 37, 39, 40, 51, 53, 54, 55, 56, 57, 58, and 63. The remaining 29 of the pages are objected to based upon Relevancy, Inadmissibility, and Unduly Prejudicial as the remaining 29 pages either: (i) relate to other caregivers and not the Plaintiff; and/or (ii) are outside of the date range identified by the Plaintiff in their Complaint and Pre-Trial Stipulation May 2022 – July 22, 2022. Other grounds to be argued ore tenus.

\*2: This exhibit is a compilation of 61 pages of paycheck stubs, designated as VIP.DOCS.92-152. Defendant does not object to Pages No. 124 through and including 135, as these encompass the period of time at issue in this action. The remaining pay stubs No. 92 – 123 and 136 – 152 are for periods outside period at issue. As such, the Defendant objects to them based upon Relevancy, Inadmissibility, and Unduly Prejudicial as the remaining documents are outside of the date range identified by the Plaintiff in their Complaint and Pre-Trial Stipulation. Other grounds to be argued ore tenus.

Plaintiffs reserve the right to amend this exhibit list.

Respectfully Submitted on October 6, 2023.

**Resubmitted by Randy M. Goldberg, Esquire, on October 11, 2023**, Attorney for the Defendants, with the only change is the amending of the Defendants Objections.

s/Brian H. Pollock, Esq.  
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